

Via ECF

Hon. Sarah L. Cave United States Magistrate Judge United States District Court-SDNY 500 Pearl Street, Courtroom 18A New York, NY 10007

Re: Sydney Hyman v. Andrew Fabbri and Jessica Cohen

<u>Case No. 19-civ. 10506 (AT)</u> Expert Witness Discovery

September 3, 2021

Dear Honorable Cave:

This firm represents the Defendants, Andrew Fabbri and Jessica Cohen ("the Defendants"), in the above-referenced matter. We write to inform the Court of, and get its assent on, the Parties' agreement to extend the dates for Expert Witness Discovery to September 28, 2021, while leaving untouched the due date for the Parties' Case Management Letter.

Opposing Counsel have met and conferred, and agreed to extend the witness designation deadline from August 30, 2021, to September 7, 2021. Counsel for the Parties have further agreed to complete expert witness depositions by the 28th of this month so as not to interfere with the Case Management Letter.

As such, we respectfully request the Court's approval of this consensual extension of Expert Witness Discovery.

Respectfully Submitted,

/s/ Murad Michael Khan

Murad Michael Khan, Esq. Khan Johnson LLC 413 W 14th Street 2nd Floor New York, NY 10014 202-810-2399 The parties' requested extension, until **September 28, 2021**, of the deadline to complete expert discovery (ECF No. 105) is GRANTED. Expert disclosures shall be served by **September 7, 2021**, and expert depositions shall be completed by **September 28, 2021**. All other terms of the Court's order at ECF No. 104 remain in effect.

The Clerk of Court is respectfully directed to close ECF No. 105.

SO ORDERED 9/3/2021

Khan Johnson LLC 413 W 14th Street• 2nd Floor • New York, NY 10014 Phone 202-810-2399 • Fax 202-478-2399 info@khanjohnson.com • khanjohnson.com